

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID E. HILL,

Plaintiff

V.

HARLEY LAPPIN, et al.,

Defendants

Civil No. 3:11-CV-1609

DECLARATION OF JONATHAN KERR

1. I, Jonathan Kerr, am an attorney at the United States Penitentiary in Lewisburg, Pennsylvania. I have access to official records compiled and maintained by the Federal Bureau of Prisons ("BOP"), and reviewed records maintained by the BOP regarding the placement of inmates in ambulatory and four-point restraints.
2. According to my review of those records, during calendar year 2019 there were 2,145 incidents throughout the BOP during which inmates were placed in ambulatory or four-point restraints.¹

In accordance with the provisions of 28 U.S.C. § 1746, I, the undersigned Jonathan Kerr, do hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on this 3rd of December 2020.

JONATHAN KERR Digitally signed by
JONATHAN KERR
Date: 2020.12.03
09:13:32 -05'00'

Jonathan Kerr
USP Lewisburg
Supervisory Attorney

¹ In most of these incidents, only one inmate was placed in restraints. However, in some incidents two or more inmates were placed in restraints. This number represents the number of incidents during which ambulatory or four-point restraints were utilized, not the number of inmates who were placed in ambulatory or four-point restraints.